

UNITED STATES OF AMERICA
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 13-CR-193

EDWARD PATTERSON, et al.,

Defendants.

**AFFIDAVIT IN SUPPORT OF DEFENDANT EDWARD
PATTERSON'S MOTION TO CONTINUE JURY TRIAL**

STATE OF WISCONSIN)
)SS.
MILWAUKEE COUNTY)

Michael J. Fitzgerald, being first duly sworn, on oath deposes and says:

1. I am an attorney licensed to practice law in the state of Wisconsin. I am admitted to practice in the United States District Court for the Eastern District of Wisconsin.

2. Edward Patterson is charged in seven counts of a sixteen count indictment. Count 1 charges conspiracy to possess with the intent to distribute and distribute controlled substances, contrary to 21 U.S.C. §841(b)(1)(B) and §846. Counts 3 through 5 charge money laundering, contrary to 18 U.S.C. §1956(a). Count 12 charges mail fraud, contrary to 21 U.S.C. §843(b). Count 13 charges possession of a firearm in furtherance of a drug trafficking crime, contrary to 18 U.S.C. §924(c)(1)(A)(i). Count 14 charges possession of

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a controlled substance, in violation of 21 U.S.C. §841(a)(1) and §841(b)(1)(c). The indictment also contains an extensive forfeiture provision.

3. The case has been designated as complex pursuant to Criminal L.R. 12(a)(1). Trial is currently scheduled to commence on May 5, 2014.

4. Mr. Patterson and the government will require additional time to complete plea negotiations. This is due to the complexity of the case, including matters referred to in my previously submitted sealed affidavit (Doc. #113). Additionally, there is in excess of \$2 million dollars in cash and property subject to forfeiture, with potential third party claimants. The parties, including the third party claimants, are attempting to reach a global resolution of all forfeiture matters. If successful, this will save a significant amount of time as opposed to the contested forfeiture process.

5. Assistant United States Attorney Bridget Domaszek has indicated that the government does not oppose this request.

6. I would request that the Court schedule a status conference for May 20, 2014, or any date within the next three to four weeks that is convenient for the Court. If the parties reach a final agreement by that time, the status conference can be used for the entry of Mr. Patterson's guilty plea.

7. For these reasons, I would request that the Court continue the jury trial and schedule a status conference in the next three to four weeks. I believe this will be an

adequate amount of time for the parties, including the third parties with an interest in potentially forfeitable assets, to complete negotiations and resolve the case.

Dated at Milwaukee, Wisconsin this 28th day of April, 2014.

s/Michael J. Fitzgerald

Michael J. Fitzgerald

Subscribed and sworn to before me this
28th day of April, 2014.

s/JoLynn M. Blei

Notary Public, State of Wisconsin

My commission expires: 4/24/16